were proved in some way which issue it was on which the former action was actually determined. Decisions on this point will be found reviewed in *Soderberg* v. *Armstrong* (June 30, 1902, Nev. C. C.), 116 Fed. Rep. 709; and *Kitson* v. *Farwell* (1890), 132 Ill. 327, 23 N. E. 1024. In the case now being considered the issues in the former action, though several in number, and any one of them sufficient to warrant the judgment, were all in issue in the last action and each equally and independently a complete defense. Under these facts it was objected that the finding in the first action was a general verdict, and that there was nothing to show on which of the issues the verdict was in fact found in favor of the successful party; and therefore that there was no estoppel as to any of them. But the court held that the objection was not well taken, because the verdict must have been found on some one of the issues, and that it did not matter which one it was, as any one of them would be a bar to the present action. *Aetna Life Ins. Co.* v. *Board of Com'rs* (Aug. 4, 1902), 117 Fed. Rep. 82. The court reviews the former decisions at considerable length.

ANTI-TRUST ACT—DISCRIMINATION IN FAVOR OF CERTAIN CLASSES.—An important point, not however brought to the surface, either in the headnote or the index of the official report, was involved in the recent case of *Connolly* v. *Union Sewer Pipe Co.* decided by the Supreme Court of the United States, (184 U. S. 540, 22 Sup. Ct. Rep. 431). The Trust statute of Illinois of 1893, after defining and forbidding trusts, and imposing penalties upon their creation and continuance, proceeding to declare (§ 9) that "the provisions of this act shall not apply to agricultural products or live stock, while in the hands of the producer or raiser." The Michigan anti-trust act of 1889, sec. 6, likewise contains this provision, but extends it further by declaring that it shall not apply "to the services of laborers or artisans who are formed into societies or organizations for the benefit and protection of their members." Exceptions substantially similar are found in the acts of several of the other states.

It was urged against the statute of Illinois, that, by the inclusion of § 9, it violated the provisions of the Fourteenth Amendment to the Constitution of the United States by denying to the classes not excepted, the equal protection of the laws, and this contention was sustained. The court further held that § 9 was evidently such an integral part of the whole statute that it could not be presumed that the act would have been adopted without this provision, and that the whole statute must therefore fail. Whether the act was also within the prohibition against the deprivation of property without due process of law, the court deemed it unnecessary to inquire. Mr. Justice McKenna alone dissented.

COURTS—CONFLICT OF JURISDICTION—CREDITOR'S BILL.—It is quite generally agreed that property held by executors and administrators cannot be levied on under attachments and executions issuing from courts other than the one appointing or having control of the executor or administrator and the administration of the estate. The reason is that no court can interfere with the affairs in any other court unless it be authorized by law to exercise such authority in such cases by appeal or other supervision. For the